



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 1, 2021

BY ECF

Hon. Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square, Courtroom 443
New York, NY 10007

Re: *United States v. Williams, et al.* 21 Cr. 603 (VEC)

Dear Judge Caproni:

The Government writes, pursuant to the Court's order dated November 1, 2021, to provide an update on the status of discovery in the above-captioned case.

On November 17, 2021, the Government sent a proposed protective order, which is attached as an exhibit to this letter, to all defense counsel in this case for their consideration. Today, the Government learned that defense counsel for all the defendants consent to the entry of the Government's proposed protective order. The Government respectfully requests that the Court enter the attached proposed protective order to govern discovery in this case.

Upon the Court's entry of a protective order, the Government is prepared to promptly produce 34.9 GB of data to Ms. Emma M. Greenwood, the court-appointed Coordinating Discovery Attorney in the above-captioned case, for dissemination to defense counsel for all defendants in this case. This discovery will include the following materials: (i) search warrants and accompanying affidavits; (ii) materials deemed by the FBI to be responsive and seized pursuant to search warrants; (iii) 2703(d) orders and applications; (iv) 2703(d) returns; (v) phone pen register returns; (vi) subpoena returns obtained from numerous sources, including but not limited to financial institutions; phone companies; email service providers; online payment companies; credit card companies; technology companies providing social media services; airlines; car service companies; and third party administrators of health benefits; (vii) aerial surveillance materials; (viii) materials obtained from the U.S. Customs and Border Protection; and (ix) materials related to the National Basketball Association Players' Health and Welfare Benefit Plan. In addition, the Government also will promptly produce certain materials pertaining to individual defendants directly to those individual defendants, including post-arrest interview

December 1, 2021

Page 2

materials and the entire contents of individual accounts that were obtained pursuant to search warrants.

Please let us know if the Court has any questions or would like any additional information.

Respectfully submitted,

]

DAMIAN WILLIAMS
United States Attorney

By: /s/
Kristy J. Greenberg
Ryan B. Finkel
Assistant United States Attorneys
(212) 637-2469/6612